

EXHIBIT G

FILED
2019 JAN 30 09:00 AM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 19-2-01930-1 KNT

The Honorable Andrea Darvas

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

MICAELA RENOJ PEREZ, an
individual,

Plaintiff,

v.

CITY OF TUKWILA, d/b/a TUKWILA
POLICE DEPARTMENT, a local
government entity; and BRENT FRANK,
an individual,

Defendants.

No. 19-2-01930-1 KNT

NOTICE OF REMOVAL

[CLERK'S ACTION REQUIRED]

TO: CLERK OF THE COURT,

AND TO: MICAELA RENOJ PEREZ, an individual, Plaintiff;

AND TO: Eric S. Nelson, Attorneys for Plaintiff

COMES NOW the Defendants, City of Tukwila, d/b/a Tukwila Police Department and Brent Frank, by and through its attorneys of record, Richard B. Jolley of Keating, Bucklin & McCormack, Inc., P.S., and hereby remove to the U.S. District Court, Western District of Washington at Seattle, the State court action described below.

1. On or about January 18, 2019, the Plaintiff, Micaela Renoj Perez, commenced an action in the Superior Court of the State of Washington in and for KING, captioned *Micaela Renoj Perez v. City of Tukwila, d/b/a Tukwila Police Department, a local government entity; and Brent Frank*, an individual (hereinafter "*Complaint*"). A true and

1 correct copy of the *Complaint* is attached to this Notice of Removal and marked as **Exhibit**
2 **A.** A copy of the *Complaint* is also included in the documents submitted with the
3 Verification of Counsel. In Count IV, V and VI of the *Complaint*, Plaintiff alleges an
4 excessive force and Monell claim against Defendants pursuant to 42 U.S.C. § 1983, which
5 creates removal jurisdiction to federal court on a federal question basis.

6 2. With the filing of this Notice of Removal with the U.S. District Court, the
7 Defendants will pay the \$400 Federal Court filing and removal fee.

8 3. Because this matter is subject to nondiscretionary removal to the U.S. District
9 Court, and this Notice of Removal has been timely filed, the instant lawsuit which is filed in
10 the King Superior Court – the county Superior Court embraced by the District Court for the
11 Western District of Washington – should be immediately removed to the District Court.

12
13 DATED: January 30, 2019

14 KEATING, BUCKLIN & McCORMACK, INC., P.S.

15
16 By: /s/ Richard B. Jolley

17 Richard B. Jolley, WSBA #23473

18 Attorneys for Defendants

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DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on January 30, 2019, a true and correct copy of the foregoing was served upon the parties listed below via the method indicated:

Attorneys for

Eric S. Nelson, WSBA #22065
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- ☒ E-mail
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- ☐ Legal Messenger
- ☐ Other Agreed E-Service

DATED this 30th day of January, 2019, at Seattle, Washington.

/s/ Christine Jensen Linder
Christine Jensen Linder, Legal Assistant